

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
FAYETTEVILLE DIVISION

IN RE:	)	
	)	Case No.: 18-00526-5-JNC
MICKEY L. FAISON	)	
TONYA FAISON,	)	
	)	
Debtors.	)	Chapter 13
_____	)	
MICKEY L. FAISON	)	
TONYA FAISON,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
LUNDQUIST CONSULTING, LLC	)	
13/7, LLC,	)	Adv. Proc. No.: 18-00087-5-JNC
	)	
Defendants.	)	
_____	)	

**MOTION FOR ENTRY OF DEFAULT**

NOW COME plaintiffs, by and through counsel, and moves this Court for an Entry of Default as provided under Rule 7055(a) of the Federal Rules of Bankruptcy Procedure. In support of such motion, plaintiffs show as follows:

1. This action was commenced on August 13, 2018, whereby plaintiffs filed a complaint in an adversary proceeding.
2. After a summons was issued by this Court, on August 15, 2018, plaintiffs mailed a copy of the Summons and Complaint in an Adversary Proceeding to both defendants directed to a person authorized to receive service of process on behalf of both defendants. Both defendants actually received the summons and

complaint as shown by the Execution of Service (DE #3) filed with this Court. The Execution of Service shows that both defendants were served by certified mail on August 20, 2018.

3. As of the filing date of this Motion for Entry of Default, plaintiffs have not had any communication from either defendant and no answer or other responsive pleading has been filed in the matter within the times allowed under the Federal Rules of Bankruptcy Procedure.

4. The plaintiffs are entitled to have the Clerk of Court make an Entry of Default in this matter pursuant to Rule 7055(a) of the Federal Rules of Bankruptcy Procedure.

WHEREFORE, plaintiff prays this Court for the following relief:

1. That an entry of default be entered against non-answering defendants Lundquist Consulting, LLC and 13/7, LLC as provided for under Rule 7055(a) of the Federal Rules of Bankruptcy Procedure; and

2. For such other and further relief as this Court deems just and proper.

This the 19th day of September, 2018.

**LAPAS LAW OFFICES, PLLC**

By: s/Adrian M. Lapas  
Adrian M. Lapas  
Attorney for Plaintiffs  
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Goldsboro, NC 27532  
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Facsimile: (919) 882-1777  
N.C. State Bar No.: 20022

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that at all times relevant herein, I am more than eighteen (18) years of age and that I served the attached MOTION FOR ENTRY OF DEFAULT on the following by, unless an alternative method is specified below, depositing a copy hereof, first-class postage prepaid, in the United States mail, addressed to the attorney for each said party as follows:

United States Corporation Agents, Inc.  
o/b/o 13/7, LLC as reg. agent  
300 Delaware Avenue, Ste., 210-A  
Wilmington, DE 19801

13/7, LLC  
Attn: Managing Agent  
Post Office Box 1931  
Burlingame, CA 94011  
(and via email: 13-7POC@lciinc.com)

Corporation Service Company  
d/b/a CSC-Lawyers Incorporating Service  
as reg. agent for Lundquist Consulting, Inc.  
2710 Gateway Oaks Drive, Ste. 150N  
Sacramento, CA 95833-3502

Lundquist Consulting, Inc.  
Attn: Managing Agent  
Post Office Box 1931  
Burlingame, CA 94011  
(and via email: 13-7POC@lciinc.com)

This the 19th day of September, 2018.

**LAPAS LAW OFFICES, PLLC**

By: s/ Adrian M. Lapas  
Adrian M. Lapas  
Attorney for Debtor